

# McNamara Declaration

## Exhibit 32

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**From:** Internet Archive  
**Sent:** Thursday, July 10, 2014 1:37 PM EDT  
**To:** Martin, Matthew  
**Subject:** Re: FW: Notice of Copyright - Attention: Christopher Butler, Office Manager

Dear Mr. Martin, Esq.,

I'm sorry to hear that Random House views the current state of the lending program as a burden. Internet Archive programs and services exist to help us fulfill our mission to provide library resources to the public. We try to make the best use of our existing resources towards these ends, and, naturally do not seek to place any burden on Random House or anyone else through any of our services, not least our lending of ebooks one-at-a-time.

I'm the Office Manager and not an attorney (we don't have one in-house at the Archive), but I do help process take down requests here. If there is a list of further postings for which you would submit a claim, please feel free to send it to me.

We've had good exchanges with Random House at past Books-in-Browsers conferences that our colleague, Peter Brantley, has organized and hosted at the Internet Archive and we hope to continue a positive relationship.

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Christopher Butler  
Office Manager  
Internet Archive  
[www.archive.org](http://www.archive.org)  
[www.openlibrary.org](http://www.openlibrary.org)

On 6/27/14 12:40 PM, Martin, Matthew wrote:

Dear Mr. Butler,

I take it from your silence over the past three months that your organization is no longer committed to removing unauthorized Penguin Random House eBooks from its library lending programs. If that is the case, we will proceed with other remedies available to us under the law, and we will take into account the added burden this places on our resources when considering if a claim for damages for past infringements of our copyrights is warranted. Please know that we reserve all rights.

Sincerely yours,

***Matthew E. Martin***  
Senior Vice President, Associate General Counsel  
Penguin Random House LLC  
1745 Broadway  
New York, New York 10019  
Phone: [REDACTED]  
Fax: [REDACTED]

Cell: [REDACTED]  
[REDACTED]@randomhouse.com

**From:** Martin, Matthew  
**Sent:** Tuesday, April 29, 2014 10:50 AM  
**To:** 'Internet Archive'  
**Subject:** RE: FW: Notice of Copyright - Attention: Christopher Butler, Office Manager

Dear Mr. Butler,

May I please have a response to my email of April 22, shown below. I would appreciate hearing from your organization before the end of this week?

**Matthew E. Martin**  
Senior Vice President, Associate General Counsel  
Penguin Random House LLC  
1745 Broadway  
New York, New York 10019  
Phone: [REDACTED]  
Fax: [REDACTED]  
Cell: [REDACTED]  
[REDACTED]@randomhouse.com

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**From:** Martin, Matthew  
**Sent:** Tuesday, April 22, 2014 9:27 AM  
**To:** 'Internet Archive'  
**Subject:** RE: FW: Notice of Copyright - Attention: Christopher Butler, Office Manager

Dear Mr. Butler,

I am writing to follow up on your email of March 31, 2014. Please advise what further steps the Internet Archive will be taking to remove Penguin Random House eBooks from its library lending program, where unauthorized copies are being generated and distributed in violation of our copyrights?

Sincerely yours,

**Matthew E. Martin**  
Senior Vice President, Associate General Counsel  
Penguin Random House LLC  
1745 Broadway  
New York, New York 10019  
Phone: [REDACTED]  
Fax: [REDACTED]  
Cell: [REDACTED]  
[REDACTED]@randomhouse.com

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**From:** Internet Archive [<mailto:info-reply@archive.org>]  
**Sent:** Monday, March 31, 2014 9:01 PM

**To:** Martin, Matthew

**Subject:** Re: FW: Notice of Copyright - Attention: Christopher Butler, Office Manager

Dear Mr. Martin, Esq.,

I'm writing to notify you that borrowing access has been disabled for the items identified in your list below:

Rando m House	9780307567062	Zoya	<a href="https://openlibrary.org/books/OL20931209M/Zoya/borrow">https://openlibrary.org/books/OL20931209M/Zoya/borrow</a>
Rando m House	9780449213445	The Chosen	<a href="https://openlibrary.org/books/OL3542635M/The_chosen/borrow">https://openlibrary.org/books/OL3542635M/The_chosen/borrow</a>
Rando m House	9780307567277	Cat's Cradle	<a href="https://openlibrary.org/books/OL24202926M/Cat's_cradle./borrow">https://openlibrary.org/books/OL24202926M/Cat's_cradle./borrow</a>
Rando m House	9780385373517	The Cat in the Hat Comes Back!	<a href="https://openlibrary.org/books/OL13582898M/The_cat_in_the_hat_comes_back!/borrow">https://openlibrary.org/books/OL13582898M/The_cat_in_the_hat_comes_back!/borrow</a>
Rando m House	9780307756657	Sleepers	<a href="https://openlibrary.org/books/OL16625360M/Sleepers/borrow">https://openlibrary.org/books/OL16625360M/Sleepers/borrow</a>
Rando m House	9780307813534	A Certain Justice	<a href="https://openlibrary.org/books/OL689816M/A_certain_justice/borrow">https://openlibrary.org/books/OL689816M/A_certain_justice/borrow</a>
Rando m House	9780553899634	Ride the River	<a href="https://openlibrary.org/books/OL24218416M/Ride_the_river/borrow">https://openlibrary.org/books/OL24218416M/Ride_the_river/borrow</a>
Rando m House	9780307386588	The Bluest Eye	<a href="https://openlibrary.org/books/OL1090305M/The_bluest_eye/borrow">https://openlibrary.org/books/OL1090305M/The_bluest_eye/borrow</a>
Rando m House	9780440337638	The Copper	<a href="https://openlibrary.org/books/OL17743489M/The_copper_beech/borrow">https://openlibrary.org/books/OL17743489M/The_copper_beech/borrow</a>
Rando m House	9780307576095	The Summons	<a href="https://openlibrary.org/books/OL22154268M/The_summons/borrow">https://openlibrary.org/books/OL22154268M/The_summons/borrow</a>
Rando m House	9780307575968	Bleachers	<a href="https://openlibrary.org/books/OL3688744M/Bleachers/borrow">https://openlibrary.org/books/OL3688744M/Bleachers/borrow</a>
Rando m House	9780307767400	Strip Tease	<a href="https://openlibrary.org/books/OL1404238M/Strip_tease/borrow">https://openlibrary.org/books/OL1404238M/Strip_tease/borrow</a>
Rando m House	9780307765697	The Secret History	<a href="https://openlibrary.org/books/OL7910485M/The_Secret_History/borrow">https://openlibrary.org/books/OL7910485M/The_Secret_History/borrow</a>
Rando m House	9780307575852	Interview with the Vampire	<a href="https://openlibrary.org/books/OL16684704M/Interview_with_the_vampire/borrow">https://openlibrary.org/books/OL16684704M/Interview_with_the_vampire/borrow</a>
Rando m House	9781588361653	In Cold Blood	<a href="https://openlibrary.org/books/OL1398670M/In_cold_blood/borrow">https://openlibrary.org/books/OL1398670M/In_cold_blood/borrow</a>
Penguin	9781440624872	Seeking Enlightenment - Nevada Barr	<a href="https://openlibrary.org/books/OL22535506M/Seeking_enlightenment...hat_by_hat/borrow">https://openlibrary.org/books/OL22535506M/Seeking_enlightenment...hat_by_hat/borrow</a>
Penguin	9781440674020	Girlfriends' Guide to Toddlers- Vicki Iovine	<a href="https://openlibrary.org/books/OL382838M/The_girlfriends'_guide_to_toddlers/borrow">https://openlibrary.org/books/OL382838M/The_girlfriends'_guide_to_toddlers/borrow</a>
Penguin	9781440635175	Soldier Spies- W.E.B. Griffin	<a href="https://openlibrary.org/books/OL3668276M/The_soldier_spies/borrow">https://openlibrary.org/books/OL3668276M/The_soldier_spies/borrow</a>

Penguin	9781101147368	About a Boy- Nick Hornby	<a href="https://openlibrary.org/books/OL698765M/About_a_boy/borrow">https://openlibrary.org/books/OL698765M/About_a_boy/borrow</a>
Penguin	9781101213131	We Were the Mulvaney's- Joyce Carol Oats	<a href="https://openlibrary.org/books/OL979824M/We_were_the_Mulvaney's/borrow">https://openlibrary.org/books/OL979824M/We_were_the_Mulvaney's/borrow</a>
Penguin	9781440630064	Behind the Lines- W.E.B. Griffin	<a href="https://openlibrary.org/books/OL796247M/Behind_the_lines/borrow">https://openlibrary.org/books/OL796247M/Behind_the_lines/borrow</a>
Penguin	9781440629969	At Home in Mitford- Jan Karon	<a href="https://openlibrary.org/books/OL24946793M/At_home_in_Mitford/borrow">https://openlibrary.org/books/OL24946793M/At_home_in_Mitford/borrow</a>
Penguin	9781101002346	Red Storm Rising- Tom Clancy	<a href="https://openlibrary.org/books/OL16075973M/Red_storm_rising/borrow">https://openlibrary.org/books/OL16075973M/Red_storm_rising/borrow</a>
Penguin	9781101495650	The Sea, The Sea - Iris Murdoch	<a href="https://openlibrary.org/books/OL6793728M/The_sea_the_sea/borrow">https://openlibrary.org/books/OL6793728M/The_sea_the_sea/borrow</a>
Penguin	9781101659854	Americana - Don DeLillo	<a href="https://openlibrary.org/books/OL2060233M/Americana/borrow">https://openlibrary.org/books/OL2060233M/Americana/borrow</a>
Penguin	9781101075869	Billy Budd, Sailor and other Stories - Herman Melville	<a href="https://openlibrary.org/books/OL24955894M/Billy_Budd_sailor_and_other_stories/borrow">https://openlibrary.org/books/OL24955894M/Billy_Budd_sailor_and_other_stories/borrow</a>
Penguin	9781440638886	Travels with Charley In Search of America - John Steinbeck	<a href="https://openlibrary.org/books/OL5851987M/Travels_with_Charley/borrow">https://openlibrary.org/books/OL5851987M/Travels_with_Charley/borrow</a>
Penguin	9781101603765	A Murder of Quality - John le Carre	<a href="https://openlibrary.org/books/OL24214625M/A_murder_of_quality/borrow">https://openlibrary.org/books/OL24214625M/A_murder_of_quality/borrow</a>
Penguin	9781101042540	A View from the Bridge - Arthur Miller	<a href="https://openlibrary.org/books/OL4538770M/A_view_from_the_bridge/borrow">https://openlibrary.org/books/OL4538770M/A_view_from_the_bridge/borrow</a>

We are currently reviewing the matter and will advise if further steps are taken responsive to your requests below.

--

Christopher Butler  
Office Manager  
Internet Archive  
[www.archive.org](http://www.archive.org)  
[www.openlibrary.org](http://www.openlibrary.org)

On 3/26/14 12:09 PM, Martin, Matthew wrote:

Dear Mr. Butler:

Thank you for your prompt response of March 18, and for removing the listing for *Feminism* by Miriam Schneir that we identified in our DMCA notice of March 13, 2014.

Following a cursory review of your sites, we have identified 29 additional titles from Penguin Random House imprints that are being offered for library lending in violation of our copyrights, and have listed those titles along with links to where they can found on the openlibrary.org site at

the end of this email. I must insist that you promptly remove these listings from your websites unless the titles are being offered exclusively and in full compliance with the Chaffee Amendment to the U.S. Copyright Act and not for any other purpose.

The list below does not purport to be a comprehensive list of Penguin Random House titles being infringed by the activities of your sites. We demand that you undertake a thorough and comprehensive search of your websites to identify all Penguin Random House titles that are being offered for lending in violation of our copyrights. If you are not familiar with the various publishing units and imprints that are published within the Penguin Random House family, I would be happy to provide you with a list to assist you in your due diligence to identify and remove unauthorized titles from your library offerings.

For purposes of DMCA compliance pursuant to Section 512(c)(3) of the U.S. Copyright Act, I certify under penalty of perjury, that I am an agent authorized to act on behalf of Penguin Random House LLC, the owner of rights to the literary works referenced below, which are reproduced on and/or distributed from your websites at the URLs referenced below. I have a good faith belief that the works identified below are not authorized by Penguin Random House, the authors of those works, their respective agents or any provision of law, and therefore such material infringes Penguin Random House's rights under U.S. copyright law.

This letter is without prejudice to all rights and entitlements which are hereby expressly reserved.

Sincerely yours,

***Matthew E. Martin***

Senior Vice President, Associate General Counsel

Penguin Random House LLC

1745 Broadway

New York, New York 10019

Phone: [REDACTED]

Fax: [REDACTED]

Cell: [REDACTED]

[REDACTED]@randomhouse.com

Publisher	ISBN	Title	Link
Random House	9780307567062	Zoya	<a href="https://openlibrary.org/books/OL20931209M/Zoya/borrow">https://openlibrary.org/books/OL20931209M/Zoya/borrow</a>
Random House	9780449213445	The Chosen	<a href="https://openlibrary.org/books/OL3542635M/The_chosen/borrow">https://openlibrary.org/books/OL3542635M/The_chosen/borrow</a>
Random House	9780307567277	Cat's Cradle	<a href="https://openlibrary.org/books/OL24202926M/Cat's_cradle/borrow">https://openlibrary.org/books/OL24202926M/Cat's_cradle/borrow</a>
Random House	9780385373517	The Cat in the Hat Comes Back!	<a href="https://openlibrary.org/books/OL13582898M/The_cat_in_the_hat_comes_back!/borrow">https://openlibrary.org/books/OL13582898M/The_cat_in_the_hat_comes_back!/borrow</a>
Random House	9780307756657	Sleepers	<a href="https://openlibrary.org/books/OL16625360M/Sleepers/borrow">https://openlibrary.org/books/OL16625360M/Sleepers/borrow</a>
Random House	9780307813534	A Certain Justice	<a href="https://openlibrary.org/books/OL689816M/A_certain_justice/borrow">https://openlibrary.org/books/OL689816M/A_certain_justice/borrow</a>
Random House	9780553899634	Ride the River	<a href="https://openlibrary.org/books/OL24218416M/Ride_the_river/borrow">https://openlibrary.org/books/OL24218416M/Ride_the_river/borrow</a>
Random House	9780307386588	The Bluest Eye	<a href="https://openlibrary.org/books/OL1090305M/The_bluest_eye/borrow">https://openlibrary.org/books/OL1090305M/The_bluest_eye/borrow</a>

Random House	9780440337638	The Copper	<a href="https://openlibrary.org/books/OL17743489M/The_copper_beech/borrow">https://openlibrary.org/books/OL17743489M/The_copper_beech/borrow</a>
Random House	9780307576095	The Summons	<a href="https://openlibrary.org/books/OL22154268M/The_summons/borrow">https://openlibrary.org/books/OL22154268M/The_summons/borrow</a>
Random House	9780307575968	Bleachers	<a href="https://openlibrary.org/books/OL3688744M/Bleachers/borrow">https://openlibrary.org/books/OL3688744M/Bleachers/borrow</a>
Random House	9780307767400	Strip Tease	<a href="https://openlibrary.org/books/OL1404238M/Strip_tease/borrow">https://openlibrary.org/books/OL1404238M/Strip_tease/borrow</a>
Random House	9780307765697	The Secret History	<a href="https://openlibrary.org/books/OL7910485M/The_Secret_History/borrow">https://openlibrary.org/books/OL7910485M/The_Secret_History/borrow</a>
Random House	9780307575852	Interview with the Vampire	<a href="https://openlibrary.org/books/OL16684704M/Interview_with_the_vampire/borrow">https://openlibrary.org/books/OL16684704M/Interview_with_the_vampire/borrow</a>
Random House	9781588361653	In Cold Blood	<a href="https://openlibrary.org/books/OL1398670M/In_cold_blood/borrow">https://openlibrary.org/books/OL1398670M/In_cold_blood/borrow</a>
Penguin	9781440624872	Seeking Enlightenment- Nevada Barr	<a href="https://openlibrary.org/books/OL22535506M/Seeking_enlightenment...hat_by_hat/borrow">https://openlibrary.org/books/OL22535506M/Seeking_enlightenment...hat_by_hat/borrow</a>
Penguin	9781440674020	Girlfriends' Guide to Toddlers- Vicki Iovine	<a href="https://openlibrary.org/books/OL382838M/The_girlfriends'_guide_to_toddlers/borrow">https://openlibrary.org/books/OL382838M/The_girlfriends'_guide_to_toddlers/borrow</a>
Penguin	9781440635175	Soldier Spies- W.E.B. Griffin	<a href="https://openlibrary.org/books/OL3668276M/The_soldier_spies/borrow">https://openlibrary.org/books/OL3668276M/The_soldier_spies/borrow</a>
Penguin	9781101147368	About a Boy- Nick Hornby	<a href="https://openlibrary.org/books/OL698765M/About_a_boy/borrow">https://openlibrary.org/books/OL698765M/About_a_boy/borrow</a>
Penguin	9781101213131	We Were the Mulvaney- Joyce Carol Oats	<a href="https://openlibrary.org/books/OL979824M/We_were_the_Mulvaney/borrow">https://openlibrary.org/books/OL979824M/We_were_the_Mulvaney/borrow</a>
Penguin	9781440630064	Behind the Lines- W.E.B. Griffin	<a href="https://openlibrary.org/books/OL796247M/Behind_the_lines/borrow">https://openlibrary.org/books/OL796247M/Behind_the_lines/borrow</a>
Penguin	9781440629969	At Home in Mitford- Jan Karon	<a href="https://openlibrary.org/books/OL24946793M/At_home_in_Mitford/borrow">https://openlibrary.org/books/OL24946793M/At_home_in_Mitford/borrow</a>
Penguin	9781101002346	Red Storm Rising- Tom Clancy	<a href="https://openlibrary.org/books/OL16075973M/Red_storm_rising/borrow">https://openlibrary.org/books/OL16075973M/Red_storm_rising/borrow</a>
Penguin	9781101495650	The Sea, The Sea - Iris Murdoch	<a href="https://openlibrary.org/books/OL6793728M/The_sea_the_sea/borrow">https://openlibrary.org/books/OL6793728M/The_sea_the_sea/borrow</a>
Penguin	9781101659854	Americana - Don DeLillo	<a href="https://openlibrary.org/books/OL2060233M/Americana/borrow">https://openlibrary.org/books/OL2060233M/Americana/borrow</a>
Penguin	9781101075869	Billy Budd, Sailor and other Stories - Herman Melville	<a href="https://openlibrary.org/books/OL24955894M/Billy_Budd_sailor_and_other_stories/borrow">https://openlibrary.org/books/OL24955894M/Billy_Budd_sailor_and_other_stories/borrow</a>
Penguin	9781440638886	Travels with Charley In Search of America - John Steinbeck	<a href="https://openlibrary.org/books/OL5851987M/Travels_with_Charley/borrow">https://openlibrary.org/books/OL5851987M/Travels_with_Charley/borrow</a>
Penguin	9781101603765	A Murder of Quality - John le Carre	<a href="https://openlibrary.org/books/OL24214625M/A_murder_of_quality/borrow">https://openlibrary.org/books/OL24214625M/A_murder_of_quality/borrow</a>
Penguin	9781101042540	A View from the Bridge - Arthur Miller	<a href="https://openlibrary.org/books/OL4538770M/A_view_from_the_bridge/borrow">https://openlibrary.org/books/OL4538770M/A_view_from_the_bridge/borrow</a>

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**From:** Internet Archive [<mailto:info-reply@archive.org>]  
**Sent:** Tuesday, March 18, 2014 8:31 PM  
**To:** Martin, Matthew  
**Cc:** Sheridan, Andrea T.  
**Subject:** Re: FW: Notice of Copyright - Attention: Christopher Butler, Office Manager

Dear Mr Martin, Esq.,

Thank you for the response. I am confirming that these listings for the text have been taken down and access thereto has been disabled.

--

Christopher Butler  
Office Manager  
Internet Archive  
300 Funston Avenue  
San Francisco, CA  
415.561.6767  
[www.archive.org](http://www.archive.org)

On 3/17/14 7:06 PM, Martin, Matthew wrote:

Christopher Butler  
Office Manager  
Internet Archive

Dear Mr. Butler,

I am an attorney with Penguin Random House. Andrea Sheridan has shared with me your email of March 13, 2014, shown below. You refer to two different ways that the texts of our copyright works are made available to the users of archive.org and openlibrary.org:

The first appears to be digital copies of our texts made available to sight-impaired readers in a specialized format. Presumably these copies are made and distributed in full compliance with the Chaffee Amendment exemption of the US Copyright Act. If that is the case, we have no issue with your conduct in this capacity and are more than happy to have you continue this valuable service. Please confirm that your activities are in indeed fully compliant with the Chaffee Amendment.

The second means referred to below appears to describe a more typical library lending platform that serves the patrons of your participating libraries regardless of any disability status. If that is the case, any copies made and distributed in this manner would *not* qualify under the Chaffee amendment and your activities would be infringing of our copyrights. The existence of a physical copy of a book in a library's collection does not entitle that library or its service providers (whether for profit or not-for-profit) to make corresponding digital copies of that book for purposes of general library lending. We have a vital and important business segment that involves selling ebooks to libraries for lending to their patrons, with distinct business models and terms specific to this market. If there is some other explanation for the copies you are making and distributing for library lending without proper authorization, please advise me of those circumstances and explain how your activities are legal.



I would appreciate your prompt response to this inquiry.

Sincerely yours,

*Matthew E. Martin*

Senior Vice President, Associate General Counsel

Penguin Random House LLC

1745 Broadway

New York, NY 10019

Phone: [REDACTED]

Fax: [REDACTED]

[REDACTED]@randomhouse.com

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**From:** Internet Archive [<mailto:info-reply@archive.org>]

**Sent:** Thursday, March 13, 2014 6:02 PM

**To:** Sheridan, Andrea T.

**Subject:** Re: Notice of Copyright Infringement

Dear Ms. Sheridan,

Thank you for contacting us about these listings.

As it may not be entirely clear, I would like to ensure that you are aware of the very limited ways in which the texts of concern are made available at [archive.org](http://archive.org) and [openlibrary.org](http://openlibrary.org), as well as the nature of our organization and services. Internet Archive is a 501.c3 non-profit online library and does not exploit materials in its collections at [archive.org](http://archive.org) or [openlibrary.org](http://openlibrary.org) for commercial gain. The texts may be made available in two limited ways:

1. to registered blind and print-disabled patrons through a special initiative undertaken by our organization, as an encrypted file in a specialized format (DAISY file) that works with devices designed to read aloud text for the blind and print-disabled. We've designed this option to be accessible to those who meet the criteria of the Library of Congress' National Library Service for the Blind and Physically Handicapped (NLS) program, which provides registered and approved blind and print-disabled citizens with an encryption key that will enable our file to play. We have posted more information about this program at <http://blog.archive.org/2010/11/26/3424/> and you can find information about the Library of Congress' own program and requirements for eligibility to receive the encryption key at <http://www.loc.gov/nls/eligible.html>.
2. via our Library Lending Program, in which physical libraries contribute and participate (you can find a list of participating libraries at <https://openlibrary.org/libraries>). The program enables an e-copy made from a library's owned physical book to be borrowed for 14 days. When an electronic copy of a book is checked out by a patron, that copy is not available to others. After a two-week period, the borrowed copy expires and throughout that period is protected from copying in a manner similar to how ebooks are protected when distributed by a bookseller.

In short, we have sought to limit the availability of more recent books through our site to ways which are analogous to how physical libraries lend and make available books outside of the scope of licensing. The lending library, for example, grants access to a service comparable to an inter-library loan (but removing the impediment of shipping a physical item).

Again, thank you for contacting us. We appreciate whatever new consideration these explanations might bring to the matter. We know that reasonable people may view these programs differently than we do. Please let me know if you have continuing objections or further questions.

Best Regards,

Christopher Butler  
Office Manager  
Internet Archive  
[www.archive.org](http://www.archive.org)  
[www.openlibrary.org](http://www.openlibrary.org)

----- Original Message -----

**Subject:** Notice of Copyright Infringement

**Date:** Thu, 13 Mar 2014 16:40:57 +0000

**From:** Sheridan, Andrea T. <[REDACTED]>

**To:** [info@archive.org](mailto:info@archive.org) <[info@archive.org](mailto:info@archive.org)>

**BY E-MAIL**

[openlibrary.org](http://openlibrary.org)

**Re: Notice of Copyright Infringement**

I, the undersigned, certify under penalty of perjury, that I am an agent authorized to act on behalf of Random House LLC, ("Random House"), the owner of certain intellectual property rights to the literary works referenced in the addendum attached hereto ("the Works"), which are reproduced on and/or distributed from your website ("the Website") at the URLs referenced in the attached addendum. I have a good faith belief that the infringing material identified on the attached addendum is not authorized by Random House, the authors of the Works, their respective agents or any provision of law, and therefore such material infringes Random House's rights according to state, federal or United States law. Please act expeditiously to remove or disable access to the material claimed to be infringing. This letter constitutes notice of infringement pursuant to Section 512(c)(3) of the U.S. Copyright Act, to the extent such notice is required.

I may be contacted at:

A Sheridan  
Penguin Random House  
1745 Broadway, 14-1  
New York, NY 10019  
Tel. [REDACTED]  
Fax [REDACTED]  
[REDACTED]@randomhouse.com

Addendum to Notice of Infringement:  
Allegedly Infringing Material

Name of Intellectual Property Owner: **Random House LLC**

**Work:**        **Unauthorized ebook editions of Feminism by Miriam Schneir**

Website:     openlibrary.org

Infringing material: <https://openlibrary.org/books/OL24737098M/Feminism/borrow>  
<https://openlibrary.org/books/OL5706200M/Feminism/borrow>